

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

WOLVERINE WORLD WIDE, INC.,

Plaintiff,

v.

Case No. 1:19-cv-00010-JTN-ESC

THE AMERICAN INSURANCE COMPANY, et. al,

Defendants.

Honorable Janet T. Neff
Mag. Judge Sally J. Berens
Special Master Paula Manderfield

PLAINTIFF’S MOTION FOR LEAVE TO FILE UNDER SEAL

Plaintiff Wolverine World Wide, Inc. (“Wolverine”), through undersigned counsel, hereby requests leave to file under seal Exhibit B to Plaintiff’s Memorandum of Law In Support of Plaintiff’s Motion to Strike or Exclude Expert Opinions of Douglas Swanson and for Sanctions under Rule 37(b)(2)(A)(ii), pursuant to W.D. MICH. L. CIV. R. 10.6. In support thereof, Plaintiff states as follows:

RELIEF SOUGHT AND GROUNDS FOR MOTION

1. Pursuant to the August 5, 2019 Stipulated Protective Order entered by the Court, (ECF No. 116 at PageID.7118), the parties may designate certain material as “Confidential” (ECF No. 116 at PageID.7121.)

2. Exhibit B to Plaintiff’s Memorandum of Law In Support of Plaintiff’s Motion to Strike or Exclude Expert Opinions of Douglas Swanson and for Sanctions under Rule 37(b)(2)(A)(ii) was produced by Defendants under the designation of “Privileged and Confidential Material.”

3. Paragraph 12 of the Stipulated Protective Order provides that the parties may not file Confidential Discovery Material with the Court unless filed under seal pursuant to W.D. MICH. L. CIV. R. 10.6. (ECF No. 116 at PageID.7124.)

4. WHEREFORE, Plaintiff respectfully requests that the Court order that the above-referenced Exhibit B be filed under seal and remain under seal.

CONCLUSION

For the reasons set forth above, Plaintiff respectfully requests that this Court grant leave to file Exhibit B to Plaintiff's Memorandum of Law In Support of Plaintiff's Motion to Strike or Exclude Expert Opinions of Douglas Swanson and for Sanctions under Rule 37(b)(2)(A)(ii) under seal, pursuant to W.D. MICH. L. CIV. R. 10.6.

Dated: September 18, 2020

Respectfully submitted,

s/ Kevin B. Dreher

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Corporation*

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CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2020, I electronically filed the foregoing document with the Clerk of Court using the ECF system which provides notice to all attorneys of record.

s/ Kevin B. Dreher
Kevin B. Dreher